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December 15, 2022

VIA ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Ishan Wahi et al.*, Case No. 22-cr-392 (LAP)

Dear Judge Preska:

We write on behalf of our client, Ishan Wahi ("Mr. Wahi"), and the government (collectively, the "Parties") concerning the motion schedule in the above-referenced matter. As the Court is aware, the current motion schedule is as follows:

Current Motion Schedule	
<i>Date</i>	<i>Description</i>
January 9, 2023	Mr. Wahi's motions due
January 30, 2023	Government's opposition briefs due
February 13, 2023	Mr. Wahi's reply briefs due

The Parties are presently engaged in productive discussions to resolve this matter. Given these resolution discussions, and the impending motion dates, the Parties respectfully request that the motion schedule be amended as follows, if convenient for the Court:

Proposed Amended Motion Schedule	
<i>Date</i>	<i>Description</i>
February 10, 2023	Mr. Wahi's motions due
March 3, 2023	Government's opposition briefs due
March 17, 2023	Mr. Wahi's reply briefs due

Hon. Loretta A. Preska
December 15, 2022
Page 2

Further, the next scheduled conference date in this matter is March 22, 2023. The Parties respectfully request that the next scheduled conference be adjourned to a date during the week of March 27, 2023, April 3-5, 2023, or the week of April 10, 2023.

Mr. Wahi consents to exclusion of time under the Speedy Trial Act until the next scheduled conference date. The government has consented to the above requests.

Thank you for the Court's consideration.

Sincerely,

/s/ David I. Miller

David I. Miller

cc: All counsel (by ECF)

- ① The proposed amended motion schedule set out above is approved
- ② The March 22, 2023 conference is adjourned to March 29, 2023 at 10:00 a.m.
- ③ Time is excluded until the date of the next conference in the interests of justice to permit the parties to discuss a pre trial disposition

12/15/22

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE